

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

Case No.: 22-cv-20712-RKA

PENINSULA PETROLEUM LIMITED,

Plaintiff,

v.

CI INTERNATIONAL FUELS LLC,

Defendant.

**JOINT MOTION FOR PERMISSION TO APPEAR VIA REMOTE CONFERENCING
AT THE APRIL 16, 2024 STATUS CONFERENCE**

Plaintiff Peninsula Petroleum Limited ("Peninsula") and Defendant CI International Fuels LLC ("CI Int'l") files this Joint Motion for Permission to Appear Via Remote Conference at the April 16, 2024 Status Conference and, in support, thereof states as follows:

I. Statement of Material Facts

1. This is a debt recovery action following the sale of marine fuel.
2. On July 3, 2024, the Court closed the case for administrative purposes pending resolution of Defendant's challenge to the Court's subject matter jurisdiction. *See* Order [ECF. No. 84]
3. On April 8, 2024, the Court set the parties for a status conference to be held on April 16, 2024 at 3:30 p.m. in the Miami Division, Courtroom 12-4. *See* Notice of Hearing, [ECF No. 109]. The parties will discuss subject matter jurisdiction at the status conference. *Id.*
4. Peninsula's national counsel, Joseph Johnson, Esq., is serving as Peninsula's lead counsel in this action and is admitted *pro hac vice*. *See* Order Granting Motion to Appear *Pro Hac Vice*, [ECF No. 9].

5. Mr. Johnson prepared the briefing and discovery on subject matter jurisdiction and can best address the subject matter jurisdiction issues.

6. However, Mr. Johnson is located in Albany, New York and his in-person attendance will require Peninsula to incur significant travel expenses and legal fees. Further, undersigned local counsel will be out-of-town during the April 16, 2024 status conference.

7. Undersigned counsel met and conferred with Defendant's counsel, Lori Dilican, Esq., who advised that she too requests leave to attend the status conference via remote conferencing.

8. In the interest of efficiency and avoidance of additional costs, the parties respectfully request the parties be permitted to attend the status conference via remote conferencing.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)

The undersigned counsel certifies that, on April 9, 2024, he conferred in good faith with Defendant's counsel, Lori Dilican, Esq., in an effort to resolve the issues raised in the Motion and Ms. Dilican confirmed that she also requests leave to attend the April 16, 2024 status conference via remote conferencing.

III. Conclusion

For the foregoing reasons, the parties respectfully request leave to appear via remote conferencing at the April 16, 2024 status conference.

Dated: April 10, 2024

Respectfully submitted,

By: /s/ Evan S. Gutwein
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 10, 2024 I electronically filed this document using the Court's CM/ECF system, which will automatically serve a copy on all counsel of record.

By: /s/ Evan S. Gutwein

<p>DILICAN LAW FIRM, P.A. Lori Dilican ldilican@dilicanlaw.com 8050 SW 72nd Ave. Apt. No. 2307 Miami, FL 33143 Tel. No. (561) 951-9612 <i>Attorneys for Defendant</i></p>	<p>HAMILTON, MILLER, & BIRTHISEL LLP Evan S. Gutwein (FBN 58741) egutwein@hamiltonmillerlaw.com 150 S.E. Second Avenue, Suite 1200 Miami, Florida 33131 (305) 379-3686 (telephone) (305) 279-3690 (facsimile)</p> <p>and</p> <p>ZEILER FLOYD ZADKOVICH (US) LLP Luke Zadkovich, Esq. Luke.zadkovich@zeilerfloydzad.com (Admitted <i>Pro Hac Vice</i>) Joseph Johnson, Esq. joe.johnson@zeilerfloydzad.com (Admitted <i>Pro Hac Vice</i>) 215 Park Avenue, 11th Floor New York, NY 100003 (917) 375-9511 <i>Attorneys for Plaintiff</i></p>
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